



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
NEW ENGLAND - REGION I  
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BOSTON, MASSACHUSETTS 02114-2023

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Orlando Monaco (orlando.monaco@navy.mil)  
Dept of the Navy, BRAC PMO Northeast  
Code 5090 BPMO NE/LM  
4911 South Broad St  
Philadelphia, PA 19112-1303

**Re: Response to EPA Comments on Sites 1, 3, and Eastern Plume, Monitoring Event 27  
(September 2005) Report, electronic mail document dated May 31, 2007, Naval Air Station  
Brunswick, Maine**

Dear Mr. Monaco:

Pursuant to ' 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below.

**(GC) 3, (GC) 5, and (SC)22.** The original Comments note that the current remedy does not address exceedances for 1,4-dioxane, arsenic, or manganese. The Responses state that Navy will address 1,4-dioxane in a separate memo and that As and Mn will be addressed following the current basewide background study. It is recommended that the GWETS influent and effluent be sampled and analyzed for As, Mn, and Fe at the earliest opportunity in order to provide critical data to support discussion at a technical meeting of the inorganics issues. These data will indicate the concentrations of As and Mn that are being removed from the aquifer overall, and whether or not the treatment process is effective in lowering them. Iron is of interest because the redox chemistry of iron often controls the fate of As and Mn.

**Specific Comment 11,** Location Page 1-6, Section 1.4 – Part of the Comment states the following:  
*"Will modifications be made to the existing sample collection procedures to increase the amount of solids in the sample for future sampling events?"*

**Response:** Historically, the sediments samples have shown low percent solids (less than 30%), therefore, changing the sample collection procedures may impact the comparability of the current data to past data, which is the reason why the sampling procedure have not been changed. However, one alternative may be, as suggested by the EPA, to collect the sediment samples and decant the excess water directly from the sampling contain. Since the sediment samples are only analyzed for TAL metals, pesticides, total organic carbon, and grain size, removing the excess

water from the container should not impact the analysis for these non-volatile compounds.

**EPA Response** – The comment has not been addressed. This is a field issue not a laboratory issue. Can the existing sampling procedure be modified so that the sampler can remove as much as possible water from the sediment sample before the sediment sample is placed in the sample container? By having the sampler remove excess water in the sample, this will help in increasing the solids content of the sample. If the sampling procedure is modified, then the EPA will need to review the modified sampling procedure.

**Response:** Comment noted; see above response. A modified sampling procedure for sediment samples collected as part of the LTMP for Sites 1 and 3 Landfill and Eastern Plume will be provided for review by the project stakeholders and issued in the Final LTMP for these sites.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

Christine A.P. Williams, RPM  
Federal Facilities Superfund Section

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